

IN RE:	THOMAS TAYLOR PEARCE,	:	CHAPTER 13
	AKA THOMAS T. PEARCE and	:	
	JENNIFER MARIE PEARCE, FKA	:	
	JENIFER MARIE MILLER, FKA	:	
	JENIFER MARIE EMKEY, AKA	:	
	JENIFER M. PEARCE, AKA	:	
	JENIFER M. MILLER PEARCE,	:	
	Debtors	:	
		:	
	JACK N. ZAHAROPOULOS,	:	
	STANDING CHAPTER 13 TRUSTEE,	:	
	Movant	:	
		:	
	vs.	:	
		:	
	THOMAS TAYLOR PEARCE,	:	
	AKA THOMAS T. PEARCE and	:	
	JENNIFER MARIE PEARCE, FKA	:	
	JENIFER MARIE MILLER, FKA	:	
	JENIFER MARIE EMKEY, AKA	:	
	JENIFER M. PEARCE, AKA	:	
	JENIFER M. MILLER PEARCE,	:	
	Respondents	:	CASE NO. 1-24-bk-02059-HWV

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- a. Residential real estate. The Trustee requests proof of the value of the Debtors' home as stated in their schedules. More specifically, the Trustee requests a copy of the listing agreement.

WHEREFORE, the Trustee alleges and avers that the Debtors' Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtors' Plan;
- b. dismiss or convert the Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 24th day of February, 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee